C.T.U.I.R. Comments/Resolution

Submitted by Joseph Richards on February 15, 2001
Responded by Oliver Wang and Craig Lawrence on March 11, 2001

General suggestions

Comment	Resolution
(1) The table of contents could be further developed to include the contents that are included in each of the attachments, 1-4.	Comment accepted. Ecology will include the contents of the attachments in the final proposed AOP.
(2) The document contains many acronyms that are not contained in the list of acronyms on page 5.	Ecology will conduct a review, and try to include all acronyms in the list on page 5. The effort may not be 100% accurate, but the important acronyms will definitely included.
(3) Page taps for the different sections including attachments would facilitate document use.	Ecology agrees. Ecology will include page taps for different sections including attachments.
(4) Consider using metric units throughout or at least both metric and English.	The purpose of this AOP is for effective regulatory enforcement and clear communication. So Ecology will use the systems and units conventionally used at the Hanford Site and regulatory bodies. There is no perceived value added by considering metric system for this AOP alone. In addition, it may cause confusion at times.

Specific suggestions

Comment	Resolution
(5) P. 9, duty to provide information. Suggest "reasonable time" be changed to a specific time such as 30 days or 60 days.	The language is a direct quote from WAC 173-401-620(2)(e). The intent of the regulation is to let regulators decide what time period is "reasonable" on a case-by-case basis. A reasonable period may very well vary depending on the complexity of the issue and whether confidential information is involved.
(6) P. 1-3, Table 1.1 List of significant emission units. There are many fossil fuel fired units that because of size are not subject to Standards of Performance for New Sources. The sum of these amounts	Placing numerous small boilers at the point of end use has several advantages. The changing nature of the site has resulted in a decline in steam demand. The new boilers will assist in minimizing energy

to about 2.75 megawatts, roughly 50% of the cited capacity in this table. The situation begs the question, are the small-dispersed units a means of circumventing regulation or do they represent good management practices and environmental stewardship.	consumption by being fully automatic, appropriately sized for the steam demands, and located near the steam end use. By locating smaller boilers near the steam end use, energy losses incurred by a large steam distribution system are minimized. A centralized steam distribution system at the Hanford Site would require miles of distribution lines with the inevitable energy losses. The air pollution emission limits imposed by the Ecology approval order number 97NM-138 provides comparable emission limitations as would be required if one or two larger boilers were built that would be subject to NSPS. In some instances the approval order is more stringent than the NSPS standard, e.g. sulfur content of fuel burned. Therefore, installing smaller boilers at or near the steam end use point is preferable from an energy usage and management standpoint. The comprehensive and stringent state and federally enforceable approval order conditions and emission limitations provide reasonable and adequate ambient air quality protection. In addition, smaller boilers placed near facilities increase overall energy efficiency by far.
(7) P. 1-13 to 1-15 of Table 1.3. The periodic monitoring frequency of once every 5 years seems inadequate for these analytes. Also should PM-2.5 be included among the monitored analytes.	The new boilers use high-grade fuel and natural gas resulting in very low air pollution. Whenever the pollution level is out of specification, responsible technicians/engineers are automatically notified and problems corrected as soon as possible not only for pollution control, but also for economic reasons. The 5-year monitoring frequency is an official confirmation for the AOP conditions. The Notice of Construction 97NM-138 was approved in 1997, prior to promulgation of the PM-2.5 regulations.

(8) P. 1-25 and 1-26 of Table 1.6. Is there a lack of consistency in VOC levels between the two discharge points 200 W-Portex and 200E C-106 sluicing?	Ecology always try to make permit conditions comparable and consistent for all emission units. For 200E C-106 sluicing, the operation is limited to 21 days (or 504 hours) per calendar year at a higher VOC level of 500 ppm carbon
(9) P. 1-26 and 1-27 Table 1.6, Discharge Point 200E-282D 001. Does limiting the operation to 350 hours pose any particular problems, say when an emergency exists? Also, should the NOx emissions have a fuel quantity basis (see also p. 1.31)?	350 hours is a period of more than two weeks. It is hard to conceive there could be a fire emergency lasting more than two weeks. However, if the generator is needed in some undefined remotely probable situations, the 350 hours limit can be extended as appropriate (in that case, additional air pollution from the generator would be of secondary concern.).
(10) P. 1-32 Table 1.6, Discharge Point 200W S-296S021-001. Air toxic detection limits are method specific, yet no specific method for monitoring is cited.	No monitoring is required beyond initial verification test for the NOC (Notice of Construction) permit. As far as this AOP is concerned, no tests are required.
(11) P. 1-44, Table 1.6. Seems incongruent to require HEPA efficiency testing yet not reference a method for a testing nor a testing frequency.	For this activity, the control technology is negative pressure and effective HEPA filters. The operation must stop if either of these two requirements is not met. No additional monitoring is required.
(12) P. 1.47. May consider adding to the list of fugitive dust controls 8. Minimizing track-out.	Ecology agrees. The item is added.
(13) P. 1-58, ammonia emission calculation. Check CF, there may be some errors in the conversion factors.	I hand-calculated this conversion factor, and it is indeed correct (2.84E-6 for standard conditions, and 2.66E-6 for testing conditions).
(14) P. 1-64, VOC emissions on a daily average. Correct the lb=mg conversion and recheck the formula for errors as well.	It's a typo. It should read 453,593 (not 453.593). Corrected. We have similar typos in other method descriptions too.
(15) P. 2-13. As a reviewer and user of this document, I prefer the detail given under zone or area on P. 2-16 to what is given under the same on this page.	The emission unit info on Page 2-16 was not relayed to the permit writing staff prior to this draft going to print. This information will be in the proposed draft with the inclusion of the changes made through public comments.
(16) P. 2-20. Is this a necessary redundancy of that contained under caption 18 on the previous page?	No, the issue with these redundant conditions has been resolved.
(17) P. 2-227, Table 2.1. It appears that part of the text has been mistakenly eliminated.	Although difficult to determine that condition 18 contains 10 bullet items, as written, the entire text correctly represents

	the approved conditions in the underlying applicable requirements as issued in the approval letter No. 00-802.